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Attorneys for Plaintiff
STAR FABRICS, INC.

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CV12-06645(CAS(CWx)
Case No.

STAR FABRICS, INC., a California
corporation,

Plaintiff,

vs.

ROSS STORES, INC., a Delaware
Corporation; CREATIVE CUTE
OPTIONS, INC., a California
Corporation; KULDIP KAUR
KOHLI, an Individual; TEXTILE
MART INC., a New York
Corporation; HAMPTON APPAREL
GROUP INC., dba LUXELL
INTIMATES, a New York
Corporation; and DOES 1 through
10,

Defendants.

PLAINTIFF'S COMPLAINT FOR:

1. COPYRIGHT INFRINGEMENT;
2. VICARIOUS AND/OR
CONTRIBUTORY COPYRIGHT
INFRINGEMENT

Jury Trial Demanded

Plaintiff STAR Fabrics, INC. ("Plaintiff" or "STAR FABRICS"), by and
though its undersigned attorneys, hereby prays to this honorable Court for relief and
remedy based on the following:

1 place of business located at 9221 Vanalden Avenue, Northridge, California 91324,
2 and is doing business in and with the State of California.

3 7. Plaintiff is informed and believes and thereon alleges that Defendant
4 KULDIP KAUR KOHLI ("KOHLI") is an individual residing in California, who,
5 at the time of the events giving rise to this lawsuit, resided and did business in
6 California. This lawsuit arises out of KHOLI's purposeful conduct and activities
7 within the State of California, which created a substantial connection with this
8 forum.

9 8. Plaintiff is informed and believes and thereon alleges that Defendant
10 TEXTILE MART INC. ("TEXTILE MART") is a corporation organized and
11 existing under the laws of the State of New York, with its principal place of
12 business located at 1 Maiden Lane, 5th Floor, New York, New York, 10038, and is
13 doing business in and with the State of California.

14 9. Plaintiff is informed and believes and thereon alleges that Defendant
15 HAMPTON APPAREL GROUP INC., doing business as LUXELL INTIMATES
16 ("HAMPTON"), is a corporation organized and existing under the laws of the State
17 of New York, with its principal place of business located at 1 Maiden Lane, 5th
18 Floor, New York, New York, 10038, and is doing business in and with the State of
19 California.

20 10. Plaintiff is informed and believes and thereon alleges that some of
21 Defendants DOES 1 through 3, inclusive, are manufacturers and/or vendors of
22 garments to Defendant, which DOE Defendants have manufactured and/or supplied
23 and are manufacturing and/or supplying garments comprised of fabric printed with
24 Plaintiff's copyrighted design(s) (as hereinafter defined) without Plaintiff's
25 knowledge of consent or have contributed to said infringement. The true names,
26 whether corporate, individual or otherwise, of Defendants DOES 1-3, inclusive, are
27 presently unknown to Plaintiff, which therefore sues said Defendants by such
28

1 fictitious names and will seek leave to amend this complaint to show their true
2 names and capacities when the same have been ascertained.

3 11. Defendant DOES 4 through 10, inclusive, are other parties not yet
4 identified who have infringed Plaintiff's copyright, have contributed to the
5 infringement of Plaintiff's copyrights, or have engaged in one or more of the
6 wrongful practices alleged herein. The true names, whether corporate, individual,
7 or otherwise, of Defendants 4 through 10, inclusive, are presently unknown to
8 Plaintiff, which therefore sues said Defendants by such fictitious names, and will
9 seek leave to amend this Complaint to show their true names and capacities when
10 the same have been ascertained.

11 12. Plaintiff is informed and believes and thereon alleges that at all times
12 relevant hereto each of the Defendants was the agents, affiliate, officer, director,
13 manager, principal, alter-ego, and/or employee of the remaining Defendants and
14 was at all times acting within the scope of such agency, affiliation, alter-ego
15 relationship and/or employment; and actively participated in or subsequently
16 ratified and adopted, or both, each and all of the acts of conduct alleges, with full
17 knowledge of all the facts and circumstances, including, but not limited to, full
18 knowledge of each and every violation of Plaintiff's rights and the damages to
19 Plaintiff proximately caused thereby.

20 **CLAIMS RELATED TO DESIGN TITLE "61850"**

21 13. Prior to the conduct complained of herein, Plaintiff purchased original
22 source artwork from an Italian art studio and created a multi-element design
23 suitable for printing on textiles. Plaintiff allocated to this artwork the Internal
24 Design Code "61850" ("Subject Design") (attached hereto as EXHIBIT 1").

25 14. Plaintiff applied for copyright registration from the United States
26 Copyright Office and was granted Registration No. VA0001-674-606 on August 3,
27 2009 (attached hereto as "EXHIBIT 2").
28

1 15. Plaintiff formatted the Subject Design for use on textiles, sampled the
2 Subject Design to prospective customers, and negotiated sales of fabric bearing the
3 Subject Design.

4 16. Plaintiff's investigation into the unlawful use of its proprietary designs
5 revealed that CUTE OPTIONS and/or KHOLI were producing, manufacturing,
6 distributing, and/or selling for profit garments which infringed the Subject
7 Design("Infringing Garments A") (a photograph of Infringing Garments A is
8 attached hereto as "EXHIBIT 3").

9 17. Plaintiff's investigation further revealed that CUTE OPTIONS and/or
10 KHOLI sold to ROSS and DOE defendants garments which infringed the Subject
11 Design ("Infringing Garments A").

12 18. Plaintiff's investigation into the unlawful use of its proprietary designs
13 also revealed that ROSS, CUTE OPTIONS and/or KHOLI and DOE defendants
14 were purchasing, distributing, and selling for profit Infringing Garments A.

15 19. Plaintiff is informed and believes, and thereon alleges, that CUTE
16 OPTIONS and/or KHOLI made slight alterations to the Subject Design and had its
17 modified design printed elsewhere, with knowledge that the Subject Design was
18 Plaintiff's proprietary design.

19 20. None of the aforementioned transactions in Paragraphs 16 through 19
20 of this Complaint were authorized by Plaintiff, and all were in violation of
21 Plaintiff's intellectual property rights.

22 **CLAIMS RELATED TO DESIGN TITLE "62386"**

23 21. Prior to the conduct complained of herein, Plaintiff created an original
24 multi-element design suitable for printing on textiles. Plaintiff allocated to this
25 artwork the Internal Design Code "62386" ("Subject Design") (attached hereto as
26 EXHIBIT 4").

1 22. Plaintiff applied for copyright registration from the United States
2 Copyright Office and was granted Registration No. VA0001-698-002 on January 7,
3 2010 (attached hereto as "EXHIBIT 5").

4 23. Plaintiff formatted the Subject Design for use on textiles, sampled the
5 Subject Design to prospective customers, and negotiated sales of fabric bearing the
6 Subject Design.

7 24. Plaintiff's investigation into the unlawful use of its proprietary designs
8 revealed that TEXTILE MART and/or HAMPTON were producing,
9 manufacturing, distributing, and/or selling for profit garments which infringed the
10 Subject Design ("Infringing Garments B") (a photograph of Infringing Garments B
11 is attached hereto as "EXHIBIT 6").

12 25. Plaintiff's investigation further revealed that TEXTILE MART and/or
13 HAMPTON sold to ROSS and DOE defendants garments which infringed the
14 Subject Design ("Infringing Garments B").

15 26. Plaintiff's investigation into the unlawful use of its proprietary designs
16 also revealed that ROSS, TEXTILE MART, HAMPTON and/or DOE defendants
17 were purchasing, distributing, and selling for profit Infringing Garments B.

18 27. Plaintiff is informed and believes, and thereon alleges, that TEXTILE
19 MART and/or HAMPTON sold made slight alterations to the Subject Design and
20 had its modified design printed elsewhere, with knowledge that the Subject Design
21 was Plaintiff's proprietary design.

22 28. None of the aforementioned transactions in Paragraphs 24 through 27
23 of this Complaint were authorized by Plaintiff, and all were in violation of
24 Plaintiff's intellectual property rights.

25 **FIRST CLAIM FOR RELIEF**

26 (For Copyright Infringement – Against All Defendants)

1 29. Plaintiff repeats, realleges, and incorporates herein by reference as
2 though fully set forth the allegation contained in the preceding paragraphs of this
3 Complaint.

4 30. Plaintiff is informed and believes and thereon alleges that Defendants,
5 and each of them, accessed the Subject Design through, without limitation, the
6 following: (a) access to Plaintiff's design library; (b) access to authorized or
7 unauthorized reproductions in the possession of other direct and third-party
8 vendors, retail stores, and/or DOE Defendants, including without limitation
9 international and/or overseas converters and printing mills; and (c) access to
10 Plaintiff's strike-offs, swatches, paper CADs and samples (d) access to garments in
11 the marketplace manufactured from fabric lawfully printed through Plaintiff.

12 31. Plaintiff is informed and believes and thereon alleges that one or more
13 of the Defendants manufactures garments and/or is a garment vendor. Plaintiff is
14 further informed and believes and thereon alleges that said Defendant(s) has an
15 ongoing business relationship with Defendant retailers, and each of them, and
16 supplied garments to said retailers, which garments infringed the Subject Design in
17 that said garments were composed of fabric which featured unauthorized print
18 designs that were identical or substantially similar to the Subject Design.

19 32. Plaintiff is informed and believes and thereon alleges that Defendants,
20 and each of them, infringed Plaintiff's copyright by importing, creating, making,
21 advertising and/or developing directly infringing and/or derivative works from the
22 Subject Design and by importing, producing, distributing, and/or selling Infringing
23 Garments A and B through a nationwide network of retail stores and through on-
24 line websites.

25 33. Due to Defendants' acts of infringement, Plaintiff has suffered
26 substantial damages to its business in an amount to be established at trial.

27 34. Due to Defendants' act of infringement, Plaintiff has suffered general
28 and special damages in an amount to be established at trial.

1 resultantly profited from the illegal reproduction, importation, purchase,
2 distribution, advertising and/or sales of product featuring the Subject Design as
3 alleged hereinabove.

4 40. Plaintiff is informed and believes and thereon alleges that Defendants,
5 and each of them, are vicariously liable for the infringements alleged herein
6 because they had the right and ability to supervise the infringing conduct and
7 because they had a direct and financial interest in the infringing conduct.

8 41. By reason of the acts of contributory and/or vicarious infringement of
9 Defendants, and each of them, acts of contributory and/or vicarious infringement as
10 alleged above, Plaintiff has suffered and will continue to suffer substantial damages
11 to its business in an amount to be established at trial, as well as additional general
12 and special damages in an amount to be established at trial.

13 42. Due to Defendants' acts of contributory and/or vicarious copyright
14 infringement as alleged herein, Defendants, and each of them, have obtained direct
15 and indirect profits they would not otherwise have realized but for their
16 infringement of the Subject Design. As such, Plaintiff is entitled to disgorgement
17 of Defendants' profits directly and indirectly attributable to Defendants'
18 infringement of the Subject Design, in an amount to be established at trial.

19 43. Plaintiff is informed and believes and thereon alleges that Defendants,
20 and each of them, have continued to manufacture and/or sell Infringing Garments A
21 and B after Plaintiff demanded that they cease and desist from engaging in same.
22 Therefore Defendants' acts of copyright infringement as alleged above were, and
23 continue to be, willful, intentional and malicious, subjecting Defendants, and each
24 of them, to liability therefore, including statutory damages under Section 504(c)(2)
25 of the Copyright Act in the sum of one hundred fifty thousand dollars (\$150,000)
26 per infringement. Further, the willful and intentional misappropriation and/or
27 infringement by Defendants, and each of them, of Plaintiff's copyrighted Subject
28 Design renders Defendants, and each of them, liable for statutory damages as

1 described herein. Within the time permitted by law, Plaintiff will make its election
2 between actual and statutory damages.

3
4 **PRAYER FOR RELIEF**

5 Wherefore, Plaintiff prays for judgment as follows:

6 **Against All Defendants**

7 1. **With Respect to Each Claim for Relief**

- 8 a. That Defendants, their agents and servants be enjoined from importing,
9 manufacturing, distributing, advertising, offering for sale, selling or
10 otherwise trafficking in any product that infringes Plaintiff's
11 copyrights in the Subject Design in any manner;
12 b. That Plaintiff be awarded all profits of Defendants plus all losses of
13 Plaintiff, the exact sum to be proven at the time of trial, or if elected,
14 before final judgment, statutory damages as available under the
15 Copyright Act, 17 U.S.C. § 101 *et seq.*;
16 c. That Plaintiff be awarded its attorneys' fees as available under the
17 Copyright Act U.S.C. § 101 *et seq.*;
18 d. That Defendants, and each of them, account to Plaintiff for their profits
19 and any damages sustained by Plaintiff arising from the foregoing acts
20 of infringement;
21 e. That Plaintiff be awarded pre-judgment interest as allowed by law;
22 f. That Plaintiff be awarded the costs of this action; and
23 g. That Plaintiff be awarded such further legal and equitable relief as the
24 Court deems proper.

25 ///

26 ///

27 ///

1 DATED: July 30, 2012

2
3 By:


HOOTAN TROY FARAHMAND, ESQ.
Attorneys for Plaintiff
STAR FABRICS, INC.

DEMAND FOR JURY TRIAL

Plaintiff hereby demands a trial by jury in this action pursuant to F.R.C.P. 38 and the Seventh Amendment of the Constitution.

DATED: July 30, 2012

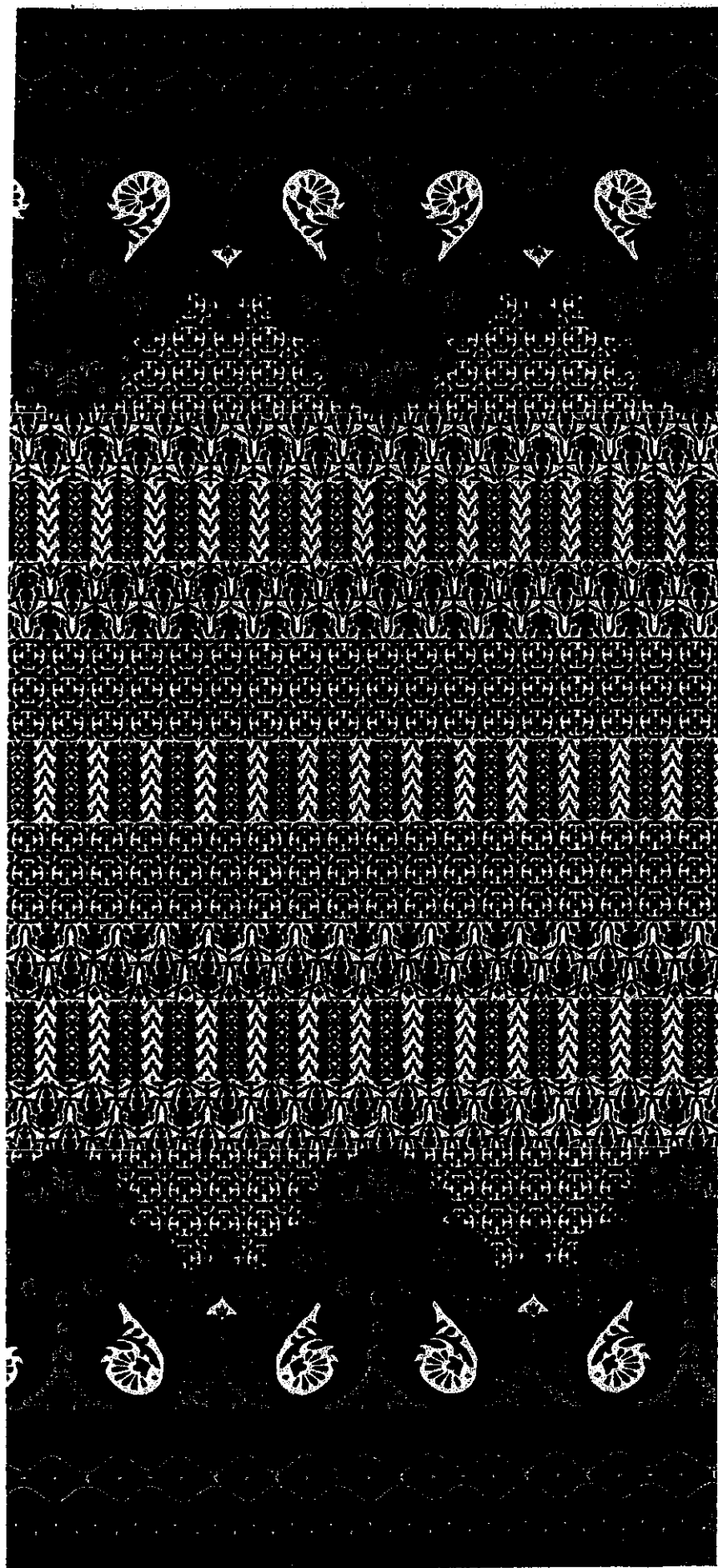
By: 

HOOTAN TROY FARAHMAND, ESQ.
Attorneys for Plaintiff
STAR FABRICS, INC.

Exhibit 1

#61850- tif
Star Fabrics, Inc.

not actual size



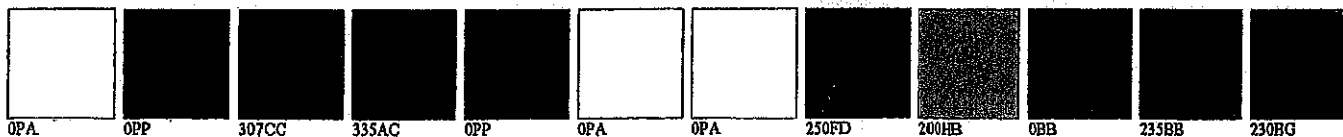


Exhibit 2

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number:
VA 1-674-606

Effective date of
registration:
August 3, 2009

Title _____

Title of Work: 61850

Completion/Publication _____

Year of Completion: 2007

Date of 1st Publication: June 15, 2007

Nation of 1st Publication: United States

Author _____

■ Author: Edizione

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: China

Copyright claimant _____

Copyright Claimant: Star Fabrics, Inc.

1440 walnut street, Los Angeles, CA, 90011, United States

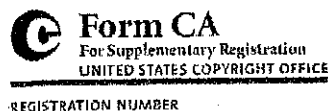
Transfer Statement: Assignment of Copyrights

Certification _____

Name: Adir Haroni

Date: July 8, 2009

Copyright Office fees are subject to change. For current fees, check the Copyright Office website at www.copyright.gov, write the Copyright Office, or call (202) 707-3000.



TX	TXU	PA	PAU	VA	VAU	SR	SRU	RE
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EFFECTIVE DATE OF SUPPLEMENTARY REGISTRATION

Month Day Year

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

Title of Work ▼
61850

Registration Number of the Basic Registration ▼
VA 1-674-606

Year of Basic Registration ▼
2009

Name(s) of Author(s) ▼
EDIZIONE

Name(s) of Copyright Claimant(s) ▼
Star Fabrics, Inc.

Location and Nature of Incorrect Information in Basic Registration ▼

Line Number 2a Line Heading or Description Name of Authors and Authors Nationality or Domicile

Incorrect Information as It Appears in Basic Registration ▼

Edizione Domiciled in: China

Corrected Information ▼

Lisa Spa Domiciled in: Italy

Explanation of Correction ▼

Sorry the correct author was overlooked.

Location and Nature of Information in Basic Registration to be Amplified ▼

Line Number _____ Line Heading or Description _____

Amplified Information and Explanation of Information ▼

MORE ON BACK ▶ • Complete all applicable spaces (D-G) on the reverse side of this page.
• See detailed instructions. • Sign the form at Space F.

DO NOT WRITE HERE

Page 1 of . . . pages

FORM CA RECEIVED

FORM CA

FUNDS RECEIVED DATE

EXAMINED BY

CORRESPONDENCE ☐FOR
COPYRIGHT
OFFICE
USE
ONLYREFERENCE TO THIS REGISTRATION ADDED TO
BASIC REGISTRATION ☐ YES ☐ NO

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

Continuation of: ☐ Part B or ☐ Part C

Correspondence: Give name and address to which correspondence about this application should be sent.

Adir Haroni
1440 Walnut Street
Los Angeles, Ca. 90011

Phone (213)688-2871 Fax (213)688-2874 Email adirh@starfabrics.com

Deposit Account: If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name _____

Account Number _____

Certification* I, the undersigned, hereby certify that I am the: (Check only one)

- ☐ author ☒ owner of exclusive right(s)
☐ other copyright claimant ☐ duly authorized agent of _____

Name of author or other copyright claimant, or owner of exclusive right(s) ▲
of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name ▼ Adir Haroni

Date ▼ 09/23/2011

Handwritten signature (X) ▼

Certificate
will be
mailed in
window
envelope
to this
address:

Name ▼
Star Fabrics, Inc.
 Number/Street/Apt ▼
1440 Walnut Street
 City/State/ZIP ▼
Los Angeles, Calif. 90011

YOU MUST:
 • Complete all necessary spaces
 • Sign your application in Space F
**SEND ALL ELEMENTS
 IN THE SAME PACKAGE:**
 1. Application form
 2. Nonrefundable filing fee in check or
 money order payable to Register of
 Copyrights
MAIL TO:
 Library of Congress
 Copyright Office
 101 Independence Avenue SE
 Washington, DC 20540-6009

*17 USC §506(e). Any person who knowingly makes a false representation of a material fact in the application for copyright registration provided for by section 409, or in any written statement filed in connection with the application, shall be fined not more than \$2,500.

Exhibit 3

“Infringing Garments A”



Exhibit 4



Exhibit 5

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Marybeth Peters

Register of Copyrights, United States of America

Registration Number
VA 1-698-002

Effective date of
registration:
January 7, 2010

Title _____

Title of Work: 62386

Completion/ Publication _____

Year of Completion: 2008

Date of 1st Publication: June 10, 2008

Nation of 1st Publication: United States

Author _____

■ Author: Star Fabrics, Inc.

Author Created: 2-D artwork

Work made for hire: Yes

Domiciled in: United States

Copyright claimant _____

Copyright Claimant: Star Fabrics, Inc.

1440 Walnut Street, Los Angeles, CA, 90011, United States

Certification _____

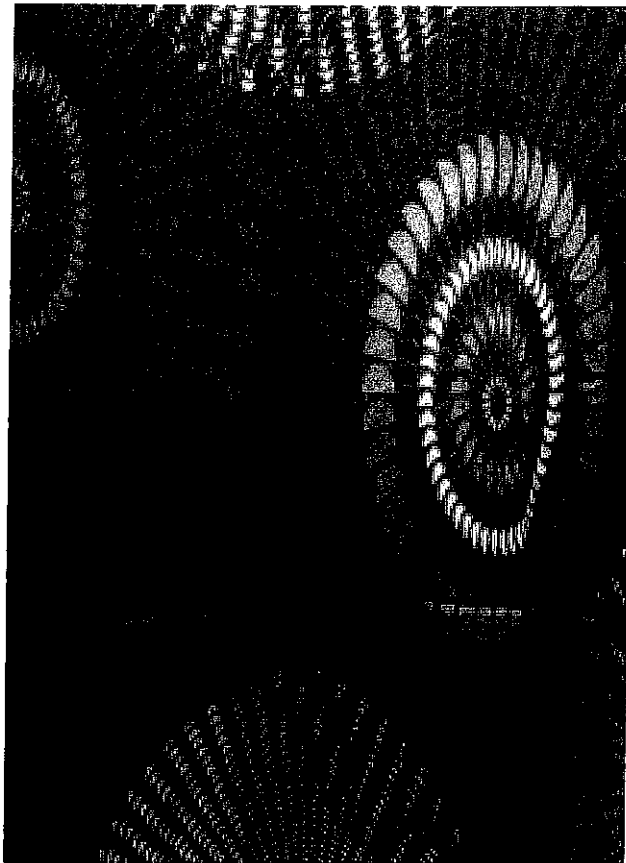
Name: Adir Haroni

Date: January 6, 2010

Exhibit 6

“Infringing Garments B”





**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Christina A. Snyder and the assigned discovery Magistrate Judge is Carla Woehrle.

The case number on all documents filed with the Court should read as follows:

CV12- 6645 CAS (CWx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☐ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

HOOTAN TROY FARAHMAND (SBN: 230345)
 3575 Cahuenga Bl. West, #580
 Los Angeles, CA 90068
 Telephone: (310) 560-0606
 Facsimile: (310) 829-0225

UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

STAR FABRICS, INC., a California Corporation,

PLAINTIFF(S)

v.

ROSS STORES, INC., a Delaware Corporation,

Please see attached form for list of additional parties

DEFENDANT(S).

CASE NUMBER

CV12-06645 CAS (CWx)

SUMMONS

TO: DEFENDANT(S): ROSS STORES, INC.; CREATIVE CUTE OPTIONS, INC.; KILDIP KAUR KOHLI; TEXTILE MART INC.; HAMPTON APPAREL GROUP INC., dba LUXELL INTIMATES

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it), you must serve on the plaintiff an answer to the attached ☒ complaint ☐ amended complaint ☐ counterclaim ☐ cross-claim or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff's attorney, H. Troy Farahmand, whose address is 3575 Cahuenga Bl. West, #580 Los Angeles, CA 90068. If you fail to do so, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

AUG - 1 2012

Dated: _____

Clerk, U.S. District Court

By: _____

Deputy Clerk

(Seal of the Court)

[Use 60 days if the defendant is the United States or a United States agency, or is an officer or employee of the United States. Allowed 60 days by Rule 12(a)(3)].

ADDITIONAL PARTIES ATTACHMENT
Attachment to Summons

SHORT TITLE: Star Fabrics vs. Ross Stores, Inc., et al.

List additional parties DEFENDANTS:

CREATIVE CUTE OPTIONS, INC., a California Corporation; KULDIP KAUR KOHLI, an Individual; TEXTILE MART INC., a New York Corporation; HAMPTON APPAREL GROUP INC., dba LUXELL INTIMATES, a New York Corporation; and DOES 1 through 10

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Star Fabrics, Inc., a California Corporation	DEFENDANTS ROSS STORES, INC., et al.
(b) County of Residence of First Listed Plaintiff (Except in U.S. Plaintiff Cases):	County of Residence of First Listed Defendant (In U.S. Plaintiff Cases Only): Alameda, California
(c) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Hootan Troy Farahmand, Esq. 3575 Cahuenga Blvd. West, Suite 580 Los Angeles, California 90068 Tel.: (310) 560-0606	Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated or Principal Place of Business in this State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4														
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5														
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6														

IV. ORIGIN (Place an X in one box only.)

☒ 1 Original Proceeding
 ☐ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify): _____
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☒ Yes ☐ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$ _____

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)
 17 U.S.C Sec. 101, et seq., 1. COPYRIGHT INFRINGEMENT, 2. VICARIOUS AND/OR CONTRIBUTORY COPYRIGHT INFRINGEMENT

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities /Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input checked="" type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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VIII(a). IDENTICAL CASES: Has this action been previously filed and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s):

FOR OFFICE USE ONLY: Case Number: _____

CV12-06645

**UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET**

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

VIII(b). RELATED CASES: Have any cases been previously filed that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: List the California County, or State if other than California, in which **EACH** named plaintiff resides (Use an additional sheet if necessary)

☐ Check here if the U.S. government, its agencies or employees is a named plaintiff.

Los Angeles County

List the California County, or State if other than California, in which **EACH** named defendant resides. (Use an additional sheet if necessary).

☐ Check here if the U.S. government, its agencies or employees is a named defendant.

Ross Stores, Inc.: Delaware

Ross Dress For Less, Inc.: Virginia

Creative Cute Options, Inc.: Los Angeles County

Harinder Singh Kohli: Los Angeles County

Kuldip Kaur Kohli: Los Angeles County

List the California County, or State if other than California, in which **EACH** claim arose. (Use an additional sheet if necessary)

Note: In land condemnation cases, use the location of the tract of land involved.

Los Angeles County

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date July 30, 2012

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))